

# OSBORN LAW P.C.

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## MEMO ENDORSED

April 2, 2024

Application GRANTED. No further extensions will be granted. SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
April 3, 2024

### VIA ECF

Honorable Barbara C. Moses  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Crosbie v. Commissioner of Social Security*  
Civil Action No. 1:23-cv-07890-BCM

Dear Judge Moses,

We write on behalf of our client, Philecia Kerrie Crosbie, with the consent of the defense, to request a 30-day extension to file her motion for judgment on the pleadings which is currently due on April 5, 2024, per the Court's January 4, 2024 Order granting Extension of Time to file. This is the parties' second request for an extension. The reason for this request is that Plaintiff's counsel currently has over two dozen Social Security briefs and multiple briefs in other cases due in the next three weeks.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her ~~motion for judgment on the pleadings~~ **brief (see Supp. Soc. Sec. R. 6)** on or before: **May 5, 2024;**
- Defendant to file its ~~response to plaintiff's motion/cross-motion~~ **brief (see Supp. Soc. Sec. R. 7)** on or before: **August 4, 2024;** and
- Plaintiff to file her reply, if any, on or before: **August 19, 2024.**

Honorable Barbara C. Moses

April 2, 2024

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

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cc: Jonathan King, Esq. (by ECF)